

## www.recylex.eu confidentiality policy

**Date** 1 April 2019

**Subject** www.recylex.eu confidentiality policy

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### 1. WHY HAVE A CONFIDENTIALITY POLICY?

The Recylex Group's website accessible at the address [www.recylex.eu](http://www.recylex.eu) (hereinafter the "Site") belongs to the company RECYLEX S.A. (hereinafter "RECYLEX S.A.") and relates to that company and to all companies 50% of which it directly or indirectly controls (hereinafter "RECYLEX"), the full contact details of which are set out at [Point 2](#) below.

We attach great importance to the privacy of users of the Site (hereinafter "You") and to processing their personal data with the greatest care and with the highest level of protection in accordance with Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter the "GDPR") and the domestic law applicable in this area.

In particular, this Confidentiality Policy provides you with information on:

- The personal data concerning you that we collect and the reasons why we do so ([Points 3 and 4](#));
- The way in which we use your personal data ([Points 5, 6, 7 and 8](#));
- The rights that you have with regard to your personal data and the ways in which to exercise them ([Points 9 and 10](#));
- The cookies used on the Site and the ways in which you can object to such use ([Point 11](#)).

A glossary of the main legal terms used in this Confidentiality Policy is also provided at the end of this document.

## 2. WHO IS RESPONSIBLE FOR THE USE OF YOUR DATA IN THE CONTEXT OF YOUR USE OF THE SITE?

The person responsible for the processing of your personal data (the “Controller”) described in this Confidentiality Policy is the company RECYLEX S.A., with authorized share capital of €9,526,568.34, which is registered at the Paris Commercial and Companies Registry under the number 542 097 704, and whose registered office is at 6, place de la Madeleine, 75008 Paris, France.

You can contact RECYLEX by e-mail at the address [info@recylex.eu](mailto:info@recylex.eu), or using the general contact form accessible at the following address: [www.recylex.eu/fr/contact](http://www.recylex.eu/fr/contact).

## 3. WHY AND ON WHAT BASIS DO WE COLLECT YOUR PERSONAL DATA?

We collect personal data concerning you for various reasons.

We can only collect and use your personal data if such use is based on one of the legal grounds laid down in the GDPR. These grounds include, for example:

- Compliance with a legal or regulatory obligation to which RECYLEX is subject;
- The performance of a contract concluded between you and RECYLEX, or of pre-contractual steps with a view to the conclusion of such a contract;
- The pursuit of a legitimate interest of RECYLEX.

The table below contains a detailed list of the circumstances in which RECYLEX collects personal data concerning you, the reasons why these personal data are processed (the “purpose” of this processing from the point of view of RECYLEX), and the relevant legal ground.

The time of collection	Purpose	Legal ground
When you connect to and browse the Site	To enable your connection and browsing on the Site	Legitimate interest of RECYLEX
	To know and measure the number of visits to the various pages of the Site*	Legitimate interest of RECYLEX

	*If and only if you have agreed to the use of the Google Analytics cookies referred to in <b>Point 11</b> below	
When you use the contact form ( <a href="http://www.recylex.eu/en/contact">www.recylex.eu/en/contact</a> )	To process your messages and requests for information sent using the contact form	Legitimate interest of RECYLEX
When you subscribe for the RECYLEX financial newsletter (on the <a href="http://www.recylex.eu/en/publications">www.recylex.eu/en/publications</a> page)	To send you each new issue of the financial newsletter	Your consent (expressed when you subscribe for the financial newsletter)
When you send an unsolicited application by e-mail via the “Career” page of the Site ( <a href="http://www.recylex.eu/en/career">www.recylex.eu/en/career</a> )	To process your application and to respond to it	Pre-contractual steps at your request

#### 4. WHAT PERSONAL DATA CONCERNING YOU DO WE COLLECT?

The following table details the personal data concerning you that we collect for each processing purpose.

The time of collection	Purpose	Data collected
When you connect to and browse the Site	To enable your connection and browsing on the Site	<ul style="list-style-type: none"> <li>The time and date of the request sent to the Site’s server</li> <li>Technical information relating to your terminal (e.g. type of terminal, IP address, type and version of the operating system) and to your internet browser (e.g. software name and version)</li> </ul>
	To know and measure the number of visits to the various pages of the Site*	<ul style="list-style-type: none"> <li>Information relating to the pages visited, the content viewed and the duration of browsing</li> </ul>

	*If and only if you have agreed to the use of the Google Analytics cookies referred to in <b>Point 11</b> below	
When you use the contact form ( <a href="http://www.recylex.eu/en/contact">www.recylex.eu/en/contact</a> )	To process your messages and requests for information sent using the contact form	<ul style="list-style-type: none"> <li>▪ Your name and forename</li> <li>▪ Your e-mail address</li> <li>▪ The RECYLEX department to which your request relates</li> <li>▪ Your message (free field)</li> </ul>
When you subscribe for the RECYLEX financial newsletter ( <a href="http://www.recylex.eu/en/publications">www.recylex.eu/en/publications</a> )	To send you each new issue of the financial newsletter	<ul style="list-style-type: none"> <li>▪ Your e-mail address</li> <li>▪ Your status (shareholder, investor, analyst, journalist, partner, other)</li> </ul>
When you send an application via the “Career” page of the Site ( <a href="http://www.recylex.eu/en/career">www.recylex.eu/en/career</a> )	To process your application and to respond to it	<ul style="list-style-type: none"> <li>▪ Your e-mail address</li> <li>▪ Any data that you choose to include in the application that you send to us</li> </ul>

## 5. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

### With service providers and subcontractors

For the purposes indicated above at **Points 4 and 5**, we may entrust certain processing tasks relating to your data to third parties, for instance:

- The providers of hosting services and relevant databases for the Site;
- The providers of e-mail routing services for the sending of the financial newsletter;
- The providers of statistical tools to measure the number of visits to the various pages of the Site (the company Google, which provides the Google Analytics solution).

### With other RECYLEX Group subsidiaries

In the context of the processing of unsolicited applications, in particular, we may direct your messages to other RECYLEX Group departments or subsidiaries depending on the department and the country to which your application relates.

### With public authorities

We may have to respond to requests to provide data issued by authorities legally authorized to make such requests, in particular to satisfy national security requirements or to apply the law.

### In the context of a transaction

In the context of specific company transactions (for example: mergers, acquisitions, consolidation or sale of RECYLEX assets), we might share your personal data with buyers or sellers that are parties to such transactions.

## 6. DO WE USE YOUR PERSONAL DATA IN ANY OTHER WAY?

We neither sell nor lease your personal data to any other organization or company.

We also have no partnerships or special relationships with internet advertising companies.

## 7. FOR HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

We have established precise rules concerning the period of retention of your personal data.

This period varies according to the different objectives for RECYLEX of the processing of such data, and must take account of any legal obligations requiring RECYLEX to retain some of your data.

The following table details the periods of retention provided for each processing purpose.

The time of collection	Purpose	The data retention period
When you connect to and browse the Site	To enable your connection and browsing on the Site	30 days
	To know and measure the number of visits to the various pages of the Site*	26 months

	*If and only if you have agreed to the use of the Google Analytics cookies referred to in <b>Point 11</b> below	
When you use the contact form ( <a href="http://www.recylex.eu/en/contact">www.recylex.eu/en/contact</a> )	To process your messages and requests for information sent via the contact form	24 months
When you subscribe for the RECYLEX financial newsletter ( <a href="http://www.recylex.eu/en/publications">www.recylex.eu/en/publications</a> )	To send you each new issue of the financial newsletter	Until you unsubscribe from the financial newsletter
When you send an application by e-mail via the “Career” page of the Site ( <a href="http://www.recylex.eu/en/career">www.recylex.eu/en/career</a> )	To process your application and respond to it	Until the end of the recruitment process*  *We may retain your application thereafter so as to potentially offer you other positions, unless you object to this. We will remind you of this possibility when we respond to your application.

## 8. ARE YOUR PERSONAL DATA SENT ABROAD?

For certain processing purposes, some of your data may be sent to other countries located in the European Union, such as Germany, where the RECYLEX Group also has establishments. Within the European Economic Area (the 28 Member States of the European Union, Iceland, Norway and Liechtenstein), your personal data have the same level of protection.

Your data are not transferred outside the European Economic Area.

## 9. WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?

We wish to give you the clearest possible information regarding the rights you have in respect of your personal data. We also want you to be able to exercise those rights simply.

A summary of your rights and explanations as to how to exercise them are set out below.

### The right of access

You have the right to require us to allow you access (i) to all the personal data that we hold concerning you, and to obtain a copy of such data; and (ii) to all the following information that we hold:

- The categories of personal data that we collect concerning you;
- The reasons why we use such data and the relevant legal ground;
- The categories of persons to whom your personal data have been or will be provided, in particular those persons located outside the European Economic Area;
- The period of retention that we apply to your personal data;
- Your rights as listed in in this section of the Confidentiality Policy;
- The source or sources from which your personal data are collected;
- The way in which your personal data are protected when transferred to countries outside the European Economic Area.

### The right to rectification

You have the right to require us to correct and/or update the personal data we hold concerning you, in the event that you notice or suspect that such data are inaccurate.

### The right to erasure

You have the right to require us to delete the personal data that we hold concerning you, in the following cases:

- Your personal data are no longer required for the reasons for which they were collected or processed;

- You have withdrawn the consent on which the processing of your personal data by RECYLEX was based;
- You have objected to the processing of your data for reasons relating to your particular situation (see [“The right to object “](#) below), and there are no compelling and legitimate grounds for continuing such processing;
- You have objected to continuing to receive commercial solicitations from us (see [“The right to object “](#) below);
- The processing of your personal data by RECYLEX is contrary to applicable laws and regulations;
- Your personal data must be deleted to comply with a legal obligation provided for by European Union law or by the domestic law of a Member State of the European Union to which RECYLEX is subject;
- Your personal data were collected in the context of the Site at a time when you were a minor.

**N.B.** Even in these cases, however, it is possible that we will not be in a position to act on your request for the deletion of your data. The law provides for a certain number of exceptions in which data can be retained, for example for the purposes of evidence in court.

## [The right to restrict processing](#)

You have the right to require us to restrict the processing of personal data that we hold concerning you.

For us, restriction of processing means retaining your personal data without using them (locking), while if necessary moving it to a separate file or server.

You can require and obtain such restriction in the following cases:

- You have disputed the accuracy of certain data that we hold concerning you (see [“The right to rectification”](#) above): you can then require the processing of such data to be restricted for the necessary verification period.
- You regard the processing of your data as not being compliant with applicable laws and regulations: rather than requiring the deletion of your data in accordance with the

section **"The right to erasure"** above, you can require the processing of such data to be restricted.

- Your data are no longer required for the reasons for which they were initially collected or processed, but nevertheless you want us to retain them, without using them, because you envisage using them for the purposes of evidence in court.
- You have objected to the continued processing of your data (see **"The right to object"** below): you can then require the processing of such data to be restricted for the period necessary to verify the justification for that request.

In the event that processing is restricted, your personal data affected by the processing will no longer be processed in any way without your prior agreement, with the exception of their retention (storage).

Such personal data may nevertheless still be processed in order to establish, exercise or defend legal rights, or for the protection of the rights of another legal or natural person, or on important public interest grounds within the European Union or the Member State concerned.

## [The right to withdraw consent](#)

When the processing of your personal data by RECYLEX is based on your consent (for example: in the case of the financial newsletter), you can withdraw such consent at any time, without cost and without justification.

The withdrawal of your consent is only valid for the future: it will have the effect of ending processing for the relevant purpose.

**In the case of the financial newsletter, you can withdraw your consent very easily by clicking on the unsubscribe link contained in each e-mail sending the newsletter. You will then be unsubscribed and will no longer receive subsequent issues of the newsletter.**

## [The right to object](#)

You have the right to object to us processing your personal data, when the legal ground for the processing in question is a legitimate interest of RECYLEX or of a third party (see the table of legal grounds under **Point 3** above).

In that event your objection must be for reasons relating to your particular situation. RECYLEX will assess the validity of those reasons having regard to any compelling legitimate grounds that we may have to continue such processing.

You can also object at any time, **without reasons**, to any processing of your personal data for the purpose of sending commercial solicitations, and in particular advertisements. You can also object to profiling insofar as it is associated with such solicitations (for example: when we send you personalized content).

### [The right to portability](#)

You have the right to the portability of your personal data that have been collected directly from you, in the context of automated processing on the legal ground of your consent or the performance of a contract concluded between RECYLEX and you.

“Portability” means the right:

- To retrieve or ensure that we send you a copy of your personal data in a structured format which is machine-readable, enabling their re-use;
- To ensure that we send these data in such a format to any third party of your choice, in particular a service provider of your choice.

This right applies both to your data declared actively and consciously such as data provided to subscribe for the financial newsletter, and to information collected by RECYLEX in the context of your browsing on the Site.

### [The right to give instructions regarding the treatment of your data after your death](#)

You can give us general or specific instructions relating to the retention, deletion or communication of your personal data after your death.

These instructions can also be registered with a “trusted certified digital third party”. These instructions (a kind of “digital will”) can appoint a person responsible for their performance; otherwise, your heirs will have that responsibility.

In any event, you can inform us at any time that in the event of your death, you do not wish your personal data to be communicated to a third party, including your heirs.

## How can you exercise your rights?

All that is required is to send us an e-mail to the address [info@recylex.eu](mailto:info@recylex.eu) or to write to us by post at the registered office of RECYLEX S.A. (6, place de la Madeleine, 75008 Paris, France).

It is important that you indicate the right that you wish to exercise and the reasons for your request, and that you attach a copy of both sides of your identity card. The request must also specify the address at which you wish to receive our reply.

We have a period of one month to respond to your request, plus two additional months in the case of a request that requires detailed research or in the event that we receive too many requests.

For the various reasons set out above in respect of each right, it is possible that we will be unable to act on your request. In that event, we will of course ensure that we give you the clearest possible response.

## **10. WHAT CAN YOU DO IF YOU DISAGREE WITH THE WAY IN WHICH RECYLEX PROCESSES YOUR PERSONAL DATA?**

If you think that we are not adequately protecting your personal data, we ask in the first instance that you contact us directly by writing to the address given above, [info@recylex.eu](mailto:info@recylex.eu), or by post at the registered office of RECYLEX S.A. (6, place de la Madeleine, 75008 Paris, France).

If you are not satisfied with our reply, you have the right to make a complaint to the French authority responsible for the protection of personal data, the *Commission Nationale de l'Informatique and des Libertés* (the “CNIL”):

- By post: 3 Place de Fontenoy, TSA 80715, 75334 Paris Cedex 07, France;
- By telephone: (+33) 1 53 73 22 22; or
- Via its website: [www.cnil.fr](http://www.cnil.fr).

## **11. DOES THIS SITE USE COOKIES OR OTHER TECHNOLOGIES TO TRACK MY BROWSING?**

RECYLEX uses “Google Analytics” cookies to know and measure the number of visits to the various pages and content of the Site.

These cookies are very small text files placed on your terminal (for example: computer, smartphone, tablet) by the services of the company Google, in order to gather information about your browsing.

They are placed with your consent when you click on “**I agree**” in the banner that is displayed at the bottom of your screen when you first log on to the Site.

You are not in any circumstances obliged to agree to the use of cookies. If you refuse, this will not affect your browsing experience on the Site.

You can at any time change your decision and your preferences regarding cookies by configuring your browsing software. This enables you:

- To delete the cookies already placed on your terminal; and
- To prevent new cookies being placed there by a specific website.

In order to do this, we suggest that you refer to the documentation of your browsing software, such as: [Mozilla Firefox](#); [Internet Explorer](#); [Google Chrome](#); [Opera](#); [Safari](#).

## **12. HOW CAN I FIND OUT IF THIS CONFIDENTIALITY POLICY HAS BEEN AMENDED?**

This Confidentiality Policy may be amended at any time, particularly to take account of any legislative or regulatory changes.

We encourage you to consult this page regularly to find out how we protect your personal data. For your information, this Confidentiality Policy was last updated on April, 1<sup>st</sup> 2019.

## GLOSSARY OF LEGAL TERMS USED IN THIS CONFIDENTIALITY POLICY

Legal term used	Definition in the GDPR	Explanation
Personal data	<p>Any information relating to an identified or identifiable natural person.</p> <p>An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.</p>	<p>Any information relating to a natural person, that is to say a directly or indirectly identifiable individual (You), as a person distinct from other persons.</p> <p>For example: a name, photo, fingerprint, e-mail address, telephone number, social security number, IP address, voice recording, internet browsing data, data relating to an online purchase, etc.</p>
Processing	<p>Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.</p>	<p>Any use of personal data regardless of the process used (recording, organizing, retaining, amending, reconciling with other data, transmitting, etc. of personal data).</p> <p>For example: the use of your data for the purposes of managing orders, deliveries, sending of newsletters, etc.</p>
The Controller	<p>The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.</p>	<p>The person, public authority, company or body which has control of your data and which decides on their use.</p> <p>This is the person that decides to create or delete processing and determines why your data will be processed and to whom they will be transmitted. It is the person with principal responsibility for ensuring the protection of your data.</p>

The Processor	A natural or legal person, public authority, agency or other body which processes personal data on behalf of the Controller.	Any natural or legal person that performs processing tasks on the instructions and under the responsibility of the Controller and that provides adequate guarantees in terms of technical and organizational security.
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